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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

ANGELICA M. AVILA,
Plaintiff,

vs.

KILOLO KIJAKAZI, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:21-cv-01283-JLT-BAM
STIPULATION AND ~~PROPOSED~~
ORDER FOR THIRD EXTENSION
OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 4-day extension of time, from August 1, 2022 to August 5, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time.

In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR) from the Eastern

District. A review of the records received shows Counsel has received at least 50 CARs, the majority of which were filed in June 2022.

Additionally, for the weeks of August 1, 2022 and August 8, 2022, Counsel currently has 18 merit briefs, and several letter briefs and reply briefs. A short four day extension would allow counsel to thoroughly brief this matter for the Court.

Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: July 22, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena
JONATHAN OMAR PENA
Attorneys for Plaintiff

Dated: July 25, 2022

PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: */s/ Patrick Snyder
Patrick Snyder
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on July 25, 2022)

ORDER

Pursuant to the parties' stipulation, and good cause appearing, Plaintiff's request for a 4-day extension of time to file a Motion for Summary Judgment is GRANTED. Plaintiff shall file a Motion for Summary Judgment on or before August 5, 2022. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: July 26, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE